## Exhibit 18

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
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BRIAN DONNELLY AKA KAWS and
KAWS INC.,

Case No.: 1:21-cv 9562 (PKC)

Plaintiff,

-against-

DEFENDANTS' AFFIDAVIT IN RESPONSE TO DEFENDANT'S DISCOVERY DEMANDS

JONATHAN ANAND, both individually and doing business as HOMELESS PENTHOUSE, PENTHOUSE THEORY, HIDEOUT.NYC, INCOGNITO and YOUNG NEON, DAVID KANG, DYLAN JOVAN LEONG YI ZHI, THE PENTHOUSE THEORY, THE PENTHOUSE COLLECTIVE and OSELL DINODIRECT CHINA LIMITED,

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I, Jonathan M. Anand, named defendant both individually and doing business as Homeless Penthouse, Penthouse Theory, Hideout Inc. and Incognito, being duly sworn and depose as under:

- 1. I am fully familiar with the facts and circumstances hereinafter set forth.
- 2. I state that I am a Citizen of United States and engaged in Internet based Business (E-Commerce) based in Country of China, and in ordinary course of Business I reside in City of Shenzhen, China, and Hong Kong. I have given U.S. address for the sake of return from customers.
- 3. I further state that some of these businesses were closed as they were not doing well.

- 4. I further state that it is not correct to state that I have failed to comply with the discovery request made by the Plaintiff.
- 5. I state that the Plaintiff is fully aware that I, for a significant period, reside in China and as such I am not able to provide demanded discoveries to the Plaintiff which are unavailable and burdensome to me.
- 6. I further state that I have substantially complied with Plaintiffs' demands and requests and have provided all answers and responses to the best of my ability and availability.
- 7. I further state that I had provided Defendants' Response to Plaintiff's First Request for Admission, Defendants' Response to Plaintiff's First Set of Document Request, Defendants' Response to Plaintiff's First Set of Interrogatories via email on date April 10, 2023, to the Plaintiff's attorney, to the best of my knowledge, availability, and information possessed by me.
- 8. I further state that I do not possess any of the documents requested by the Plaintiff except for those already provided to Plaintiff's attorney via email on April 10, 2023.
- 9. I further state that I did not own nor possess any interest in any of the businesses as mentioned in this matter except for Homeless Penthouse, which is a media outlet and online magazine.
- 10. I further state that I used to provide marketing services for some of these businesses mentioned in this matter. However, now most of these companies are no longer in business.
- 11. I further state that I was not responsible for ordering and never a part of the day-to-day operations of the businesses in this matter. I did not manage and nor supervise the businesses.

  I only offered marketing services for some of these businesses.

12. I further state that the documents, demands, and requests which are relevant to this case have been provided by me to the Plaintiff's attorney.

13. I further state that other demands by the Plaintiff are either irrelevant, burdensome, overboard, vague, and oppressive.

14. I further submit that the alleged non-providing of documents was neither intentional nor deliberate.

15. I further state that despite complying with all the demands and requests by Plaintiff, the Plaintiff continues to make demands only with an ulterior motive to burden, harass, and pressure me because the Plaintiff understands these documents don't exist and is well aware that the products to which he refers in his demands are easily available on any website like eBay, Amazon, and Alibaba to name a few. Hence, no further special documents can be produced in response to Plaintiffs' demands. I have clearly stated in my responses that I was not responsible for ordering products and nor involved in the day-to-day of these businesses.

16. I further state that I have nothing more to provide as all the deliveries and other business aspects were not operated nor conducted by me.

17. I also state that the documents demanded and non-delivery in a timely manner has not prejudiced the case of the Plaintiff.

18. In view of the above facts, I state that I have no documents and/or further information, except as those already provided, in response to the Plaintiffs' demands.

Date: June 13, 2023.

Jonathan M. Anar

## **VERIFICATION**

I hereby certify that the foregoing contents are true and correct to the best of my knowledge. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

I further certify under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that I am physically located outside the geographic boundaries of the United States, Puerto Rico, the United States Virgin Islands, or any territory or insular possession subject to the jurisdiction of the United States, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

Name: JONATH

Dated: June 13, 2023.

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